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18 Attorneys for Lyft, Inc.

19 SUPERIOR COURT OF THE STATE OF CALIFORNIA

20 IN AND FOR THE COUNTY OF SAN FRANCISCO

21 UNLIMITED JURISDICTION

22 PEOPLE OF THE STATE OF  
23 CALIFORNIA,

24 Plaintiff,

25 v.

26 UBER TECHNOLOGIES, INC., A Delaware  
27 Corporation; LYFT, INC., A Delaware  
28 Corporation; and DOES 1-50, inclusive,

Defendants.

Case No. CGC-20-584402

**DECLARATION OF ELIZABETH K.  
MCCLOSKEY IN SUPPORT OF  
DEFENDANT LYFT, INC.'S  
UNOPPOSED *EX PARTE* APPLICATION  
FOR EXTENSION OF TIME TO  
RESPOND TO COMPLAINT**

Dept.: 610  
Judge: Hon. Garrett L. Wong

Date Filed: May 5, 2020

Trial Date: TBD

ELECTRONICALLY

**FILED**

Superior Court of California,  
County of San Francisco

**06/15/2020**

**Clerk of the Court**

BY: RONNIE OTERO

Deputy Clerk

1 I, ELIZABETH K. MCCLOSKEY, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and am a partner  
3 at Keker, Van Nest & Peters LLP, located at 633 Battery Street, San Francisco, California, 94111,  
4 counsel for Defendant Lyft, Inc. ("Lyft") in the above-captioned action.

5 2. Except where expressly stated, I have knowledge of the facts set forth herein, and  
6 if called to testify as a witness thereto, could do so competently under oath.

7 3. On May 22, 2020, Plaintiff Attorney General served its Complaint and summons  
8 on Lyft. Absent any extension, Lyft's deadline to respond to the Complaint would be June 22,  
9 2020

10 4. Lyft recently retained Keker, Van Nest & Peters LLP to represent it in the above-  
11 captioned action. Because this case raises several complicated and novel legal issues, counsel for  
12 Lyft requires more than 30 days to investigate and prepare a response to the Complaint.

13 5. On June 8, 2020, my colleague Christa M. Anderson sent an email to Plaintiff's  
14 counsel Minsu Longiaru, Satoshi Yanai and Marisa Hernandez-Stern to request that Plaintiff  
15 agree to a sixty-day extension of time for Lyft to respond to Plaintiff's Complaint, so that Lyft's  
16 responsive pleading would be due on August 21, 2020.

17 6. On June 9, 2020 at 5:19 p.m., Ms. Yanai sent Ms. Anderson an email stating that  
18 Plaintiff has no objection to Lyft's requested sixty-day extension of time to respond to Plaintiff's  
19 Complaint, and would not oppose Lyft's application to the Court.

20 7. Defendants' *ex parte* application and all supporting papers were served on Plaintiff  
21 via email on June 15, 2020.

22  
23  
24 I declare under penalty of perjury under the laws of the State of California that the  
25 foregoing is true and correct to the best of my knowledge and belief.

26 Executed on June 15, 2020, in Oakland, California.  
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s/ Elizabeth K. McCloskey  
ELIZABETH K. MCCLOSKEY